

MANATT, PHELPS & PHILLIPS, LLP
Charles E. Weir (Bar No. 211091)
CWeir@manatt.com
Andrew Beshai (Bar No. 308030)
ABeshai@manatt.com
2049 Century Park East, Suite 1700
Los Angeles, CA 90067
Telephone: (310) 312-4000
Facsimile: (310) 312-4224

Attorneys for Plaintiff INTUSCARE INC.

Nossaman LLP
DAVID C. LEE (SBN 193743)
dlee@nossaman.com
50 California Street, 34th Floor
San Francisco, CA 94111
Telephone: 415.398.3600
Facsimile: 415.398.2438

NOSSAMAN LLP
KASIA PENN (SBN 306056)
kpenn@nossaman.com
18101 Von Karman Avenue, Suite 1800
Irvine, CA 92612
Telephone: 949.833.7800
Facsimile: 949.833.7878

Attorneys for Defendant RTZ ASSOCIATES, INC.

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

INTUS CARE, INC.,

Plaintiff,

vs.

RTZ ASSOCIATES, INC.; and DOES 1
through 10,

Defendants,

Case No: 4:24-cv-01132-JST

Assigned to: Hon. Jon S. Tigar

**JOINT STIPULATION TO CONTINUE
TRIAL AND PRETRIAL DATES;
[PROPOSED] ORDER**

Complaint Filed: February 23, 2024
Amended Complaint Filed: April 2, 2024
Counterclaims Filed: June 20, 2024

Plaintiff IntusCare Inc. (“Intus” or “Plaintiff”) and Defendant RTZ Associates, Inc. (“RTZ” or “Defendant”), hereby jointly submit this Stipulation seeking a continuance of the January 12, 2026 trial date and a corresponding extension of the pretrial schedule.

Counsel for both sides have met and conferred and agreed to extend the current deadlines by approximately six months. The parties believe this extension will promote efficiency because it will:

1. Accommodate witness schedules for multiple depositions, including depositions requiring cross-country travel;
2. Provide additional time for the parties to resolve outstanding discovery issues, thereby reducing the need for judicial intervention; and
3. Allow counsel additional time to complete written discovery; and
4. Allow the parties additional time to exchange expert discovery and engage in expert depositions.

The parties have jointly requested two prior extensions of discovery deadlines. This Stipulation, however, is their first request to continue the trial date. Accordingly, the parties respectfully request that the Court extend the discovery deadlines as set forth below.

Event	Current Deadline	Proposed New Deadline
Fact Discovery Cut-off	October 31, 2025	March 9, 2026
Expert Disclosures	September 15, 2025	March 23, 2026
Expert Rebuttal	October 6, 2025	April 13, 2026
Expert Discovery Cut-off	October 31, 2025	May 4, 2026
Dispositive Motion Hearing Deadline	October 9, 2025	March 19, 2026
Trial	January 12, 2026	June 8, 2026

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1 Dated: September 8, 2025

2 NOSSAMAN LLP
3 DAVID C. LEE
4 KASIA PENN

5 By: /s/ Kasia Penn
6 Kasia Penn

7 *Attorneys for Defendant* RTZ ASSOCIATES, INC.

8 Dated: September 8, 2025

9 MANATT, PHELPS & PHILLIPS, LLP

10 By: /s/ Andrew Beshai
11 Charles E. Weir
12 Andrew Beshai

13 *Attorneys for Plaintiff* INTUS CARE, INC.

14 **ATTESTATION**

15 Pursuant to Civil Local Rule 5-1(i)(3), I, Kasia Penn, attest under penalty of perjury that I
16 have obtained concurrence and authorization from Andrew Beshai, counsel for Intus, to affix his
17 signature to this filing.

18 Dated: September 8, 2025

19 NOSSAMAN LLP
20 KASIA PENN

21 By: /s/ Kasia Penn
22 Kasia Penn
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[PROPOSED] ORDER

The Court, having reviewed and considered the Parties' Joint Stipulation to Continue the Trial and Pretrial Dates Deadlines, hereby ORDERS THAT:

1. Fact Discovery Cut-off
2. Expert Disclosures:
3. Expert Rebuttal:
4. Fact and Expert Discovery Cut-off:
5. Dispositive Motion Hearing Deadline:
6. Trial:

PURSUANT TO STIPULATION, IT IS SO ORDERED

Dated:

Hon. Jon. S. Tigar
United States District Judge

PROOF OF SERVICE

The undersigned declares:

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and am not a party to the within action; my business address is c/o Nossaman LLP, 777 S. Figueroa Street, 34th Floor, Los Angeles, CA 90027.

On June 26, 2025, I served the foregoing **DOC TITLE** on parties to the within action as follows:

☐ (By U.S. Mail) On the same date, at my said place of business, Copy enclosed in a sealed envelope, addressed as shown on the attached service list was placed for collection and mailing following the usual business practice of my said employer. I am readily familiar with my said employer's business practice for collection and processing of correspondence for mailing with the United States Postal Service, and, pursuant to that practice, the correspondence would be deposited with the United States Postal Service, with postage thereon fully prepaid, on the same date at Los Angeles, California.

☐ (By Overnight Service) I served a true and correct copy by overnight delivery service for delivery on the next business day. Each copy was enclosed in an envelope or package designated by the express service carrier; deposited in a facility regularly maintained by the express service carrier or delivered to a courier or driver authorized to receive documents on its behalf; with delivery fees paid or provided for; addressed as shown on the accompanying service list.

☒ (By Electronic Service) Pursuant to California Rules of Court, rules 2.251, from service email address: jgastelum@nossaman.com, by emailing true and correct copies to the persons at the electronic notification address(es) shown on the accompanying service list.

☐ (By Electronic Service) Pursuant to California Rules of Court, rules 2.251, by submitting an electronic version of the document(s) to a court-approved third-party e-filing vendor, I caused the document(s) to be e-served to the person(s) listed on the attached service list.

Executed on June 26, 2025.

☒ (FEDERAL) I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Name

SERVICE LIST

Intus Care, Inc. v. RTZ Associates, Inc.
USDC Northern District Case No. 4:24-cv-01132-JST

MANATT, PHELPS & PHILLIPS, LLP Charles E. Weir Andrew Beshai 2049 Century Park East, Suite 1700 Los Angeles, CA 90067 Telephone: (310) 312-4000 Facsimile: (310) 312-4224 cweir@manatt.com abeshai@manatt.com	<i>Attorneys for Plaintiff INTUS CARE, INC.</i>
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